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August 29, 2023

**VIA ECF**

The Honorable Sarah Netburn, U.S.M.J.  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In Re Terrorist Attacks on September 11, 2001*; 03-md-1570 (GBD)(SN)  
*The Charter Oak Fire Ins. Co. et al v. Al Rajhi Bank et al*; 1:17-cv-02651

Dear Judge Netburn:

We represent The Charter Oak Plaintiffs in the above referenced matter and our clients have claims against Al Rajhi Bank (“ARB”). We write concerning the production made by J.P. Morgan Chase, N.A. (“JPM”) on August 2, 2023, in response to Plaintiffs’ June 13, 2022 Subpoena (“JPM Subpoena”), and this Court’s July 11, 2023 Order (ECF 9210 at pgs. 20-22).

After reviewing this production, we preliminarily believe the response made by JPM is incomplete.

We have reached out to counsel for JPM in order to facilitate a meet and confer process. However, counsel’s email reflects the fact that he will be out of the office through September 1, 2023.

In anticipation of the September 1, 2023 deadline for factual discovery, we wanted to apprise the Court of our intention to continue our good faith discussions with JPM in an effort to amicably resolve this issue. We recognize that expert discovery remains open past that time, and we will keep this Court updated as to the progress of our meet and confer process.

Respectfully submitted,

SHEPS LAW GROUP, P.C.

Robert C. Sheps, Esq

cc: All Counsel *via ECF*